

24 OCT
51 pages
Cover Letter

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DALE ARNOLD,
Petitioner

Civil No. 1:00-CV-0775

V.

Magistrate Judge Smyser

FREDERICK FRANK,
BRADFORD COUNTY DISTRICT
ATTORNEY and ATTORNEY GENERAL
OF THE COMMONWEALTH OF
PENNSYLVANIA,
Respondents

FILED
HARRISBURG, PA
APR 20 2001

RESPONDENTS' MOTION FOR CONTINUANCE

MARY E. D'ANDREA, CLERK

AND NOW COMES the Respondent, by and through its attorney, Todd K. Hinkley

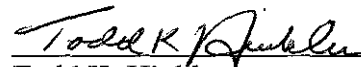
Esquire, of the Bradford County District Attorney's Office, and files this Motion for
Continuance.

1. Petitioner, Dale Arnold, has filed his Petition of writ of habeas corpus on March 8, 2001.
2. This Honorable Court has, by Order, directed the Respondents to file its Brief in opposition to said Petition on or before May 4, 2001.
3. Counsel requests an additional 60 days to complete its review and draft a brief in opposition to said petition.
4. The Petition's counsel concurs in this request for a continuance.
5. Undersigned counsel had not asked, nor received, any previous continuances to this matter.

WHEREFORE, it is respectfully requested that this Honorable Court extend the deadline for filing a brief in opposition of the petition for writ of habeas corpus until Tuesday, July 3, 2001.

Date: April 20, 2001

Respectfully submitted:



Todd K. Hinkley
First Assistant District Attorney
Bradford County District Attorney's Office
301 Main Street
Towanda, PA 18848
Attorney for Respondent
Attorney ID # 68881

CERTIFICATE OF CONCURRENCE

I, Todd K. Hinkley, of the Bradford County District Attorney's Office certify that on April 20, 2001, I contacted Assistant Federal Public Defender Daniel I. Siegel and he concurred in the Motion for Continuance.

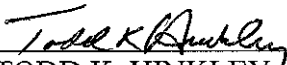
CERTIFICATE OF SERVICE

I, Todd K. Hinkley, of the Bradford County District Attorney's Office do hereby certify that on this date I served a copy of the **RESPONDENT'S MOTION FOR CONTINUANCE** by placing the same in the United States mail, first class in Towanda, Pennsylvania, addressed to the following:

Daniel I. Siegel, Esquire
Assistant Federal Public Defender
100 Chestnut Street, Suite 306
Harrisburg, PA 17101

Dale Arnold
Inmate #AK 5044
SCI Huntingdon
1100 Pike Street
Huntingdon, PA 16654-1112

Date: April 20, 2001


TODD K. HINKLEY, ESQUIRE
First Assistant District Attorney
Attorney for Respondents